

EXHIBIT B

One US Bank Plaza
505 North 7th Street, Suite 3600
St. Louis, Missouri 63101
www.koreintillery.com

STEPHEN M. TILLERY

stillery@koreintillery.com

p: 314.241.4844

 $f: 314.241.3525$

SANDOR KOREIN
STEPHEN M. TILLERY
STEVEN A. KATZ
DOUGLAS R. SPRONG
CHRISTINE J. MOODY
*GEORGE A. ZELCS
JOHN W. HOFFMAN
PETER H. RACHMAN
AARON M. ZIGLER
ROBERT L. KING
*KLINT L. BRUNO

DIANE MOORE

CHRISTIE R. DEATON

JOHN A. LIBRA

ALEXIS C. TILLERY

* MAXIMILIAN C. GIBBONS

CHRISTOPHER A. HOFFMAN

¹¹AIDAN M. MCNAMARA

* MATTHEW C. DAVIES

MICHAEL E. KLENOV

**JOSEPH A. PEREZ-MALTES

*** ROSEMARIE FIORILLO

JOHN C. CRAIG

**MICHAEL FORREST

**** JAMIE S. STEINMETZ**

*Not Licensed in Missouri

*Not Licensed in Illinois

December 16, 2011

Mr. Michael A. Pope
McDermott Will & Emery LLP
227 West Monroe Street
Chicago, IL 60606-5096
(via email and regular mail)

Re: City of Greenville, et al. v. Syngenta Crop Protection, Inc., et al.
U. S. District Court Cause No. 10-cv-188
(Syngenta witnesses outside the United States)

Dear Mike:

As I indicated in an earlier email exchange a couple of weeks ago, we would like to start the process of taking depositions of Syngenta witnesses outside of the United States. To that end, the following list of witnesses would be our first round of deponents from Basel, who we anticipate deposing in early April, 2012:

Beat Lang
Brian Manley
Carlos Elias
Christoph Werner
Hans Egli
Mike Stepan
Philippe Costrop
Willy Maurer
Gilles Nicollier

From England, starting in later April 2012 (following the Basel depositions) we would like to depose the following individuals:

Helen Tinwell
Paul LeFevre
John Ashby
Jane Botham
Tania Alvarez

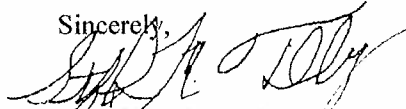
We anticipate taking additional depositions of Syngenta people outside of the United States later in the Spring or next Summer.

205 North Michigan, Suite 1950
Chicago, Illinois 60601-4269
Tel: 312.641.9750 Fax: 312.641.9751

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The order of these witnesses is not critical, but we would like to conclude them in sequential order to avoid more than a single trip for each collection of witnesses. We are willing to take these depositions at your convenience at other locations. Please contact me if you have any questions.

Sincerely,



STEPHEN M. TILLERY

SMT:cam